This feature is neither described nor even faintly suggested by Stevens.

Examiner takes the position that Applicant's "first and second source terminal" may be equated to Stevens' terminals 12a and 12b. However, that position is manifestly non-appropos.

Stevens's terminals 12a and 12b are connected with the "AC line"; which means that there is indeed an AC voltage provided between his terminals 12a and 12b. However, as would be very well known by a person possessing but ordinary skill in the particular art pertinent hereto (i.e., a "skilled artisan"), both of the conductors of an AC power line have "substantial galvanic connection" with earth ground. Therefore, neither of Stevens' terminals 12a and 12b may be characterized as having "substantially no galvanic connection" with earth ground.

Moreover, even in the absence of the AC power line, Stevens terminals 12a and 12b are galvanically conected with each other, therefore making it impossible for one of the terminals to be galvanically connected with earth ground without also having the other terminal galvanically connected with earth ground -- or vice versa.

In other words, for Examiner to equate Stevens' terminals 12a and 12b with Applicant's "first and second source terminal" is totally and utterly non-appropos.

(b) Claim 23 represents the arrangement of claim 22 except further characterized in that "the frequency of the AC voltage is larger by at least two orders of magnitude compared with the frequency of the power line voltage".

Examiner's position to the effect that Applicant's "first and second source terminal" correspond to Stevens' terminals 12a and 12b (across which is provided a power line voltage) is totally inconsistent with the fact that the frequency of Applicant's "AC voltage is larger by at least two orders of magnitude compared with the frequency of the power line voltage".

(c) Claim 25 represents the arrangement of claim 22 except that:

"prior to lamp ignition: (i) an ignition voltage exists between the lamp terminals; and (ii) the ignition voltage includes a substantial component of DC voltage".

This feature is neither described nor even faintly suggested by Stevens.

In fact, with reference to Stevens' Figs. 4A and 4B, as a skilled artisan would readily see, there is no provision whatsoever by which a DC voltage is, or can be, provided between the lamp terminals.

If Examiner were to continue to take a contrary position, he is requested to point out exactly where and/or how Stevens describes or suggests a feature whereby:

"prior to lamp ignition: (i) an ignition voltage exists between the lamp terminals; and (ii) the ignition voltage includes a substantial component of DC voltage".

(d) Claim 25 defines an arrangement including:

"inverter ... operative to provide an AC voltage between a pair of AC terminals",

"gas discharge lamp having a pair of lamp terminals", and

"a sub-circuit connected between the AC terminals and the lamp terminals";

"the arrangement being operative to cause the RMS magnitude of the AC voltage to be higher after lamp ignition compared with before lamp ignition".

This feature is neither described nor even faintly suggested by Stevens.

In fact, in an ordinary electronic ballasts, the RMS magnitude of the inverter AC output voltage is substantially the same "after lamp ignition compared with before lamp ignition".

If Examiner were to continue to take a contrary position, he is requested to point out exactly where and/or how Stevens describes or suggests a feature whereby the inverter AC output voltage is "higher after lamp ignition compared with before lamp ignition".

(e) In support of his rejection of claims 25 and 26, Examiner states that:

"It should be noted that the limitations of claims ... 25, and 26 are inherent characteristics of most high frequency inverter ballast including that of Stevens."

That statement by Examiner is blatently erroneous.

In fact, except for his own designs, Applicant is not aware of any high frequency inverter ballast exhibiting the features represented by claims 25 and 26.

Clearly, Examiner is taking a position as if he were an expert in electronic ballast technology. For Examiner to do so is highly inappropriate.

Examiner rejected claims 27-28 and 30-37 under 35 USC 102b as anticipated by or, in the alternative, under 35 USC 103 as obvious over Stevens.

Applicant traverses these rejections for the following reasons.

(f) With reference to Applicant's traversal of Examiner's rejection of claims 22-23 and 25-26, it is clear that Examiner has misunderstood Stevens in several material respects. These same or similar misunderstandings carry over to Examiner's rejection of claims 27-28 and 30-37.

(g) Exemplary claim 27 includes:

"a second sub-circuit connected with the DC terminals and operative to provide an AC voltage between a pair of AC terminals; the second sub-circuit ... having two transistors series-connected between the DC terminals; the AC voltage being characterized by being non-sinusoidal and by having a peak-to-peak magnitude distinctly higher than the peak magnitude of the power line voltage"

This feature is neither described nor even faintly suggested by Stevens.

If Examiner were to continue to take a contrary position, he is requested to point out exactly where and/or how Stevens describes or suggests a feature whereby the inverter AC output voltage is "characterized by being non-sinusoidal and by having a peak-to-peak magnitude distinctly higher than the peak magnitude of the power line voltage"

Applicant can only evaluate the merit of Examiner's position after Examiner points out exactly where in Stevens he finds two terminals across which is provided such an AC output voltage.

(h) Exemplary claim 32 includes:

"structure ... having a protruding threaded portion adapted to be screwed into and held by an Edison-type lamp socket".

This feature is neither described nor even faintly suggested by Stevens.

If Examiner were to continue to take a contrary position, he is requested to point out exactly where and/or how Stevens describes or suggests a:

"structure ... having a protruding threaded portion adapted to be screwed into and held by an Edison-type lamp socket".

In supporting his rejection, Examiner states that:

"to use the recited circuit in an edison type lamp socket would be obvious as it is a notoriously old design expedient".

This argument is erroneous and not to the point.

What Examiner would have to do to show obviousness is to identify in Stevens some suggestion to the effect that it would be beneficial to "combine the three sub-circuits and the gas discharge lamp in such manner as to result in a single substantially rigid physical structure ... having a threaded portion adapted to be screwed into ... an Edison-type lamp socket".

For Examiner to dismiss Applicant's claimed invention by merely asserting that: "to use the recited circuit in an edison type lamp socket would be obvious as it is a notoriously old design expedient" is improper for several reasons:

(1) The claimed invention is not directed to using the "recited circuit in an edison type lamp socket". Rather, it is directed to an arrangement including "a protruding threaded portion ...". Applicant's invention as actually claimed does not specify the use of the arrangement recited in the claim.

(2) In fact, "to use the recited circuit in an edison type lamp socket" ... is not "a notoriuously old design expedient". If Examiner were to persist in holding otherwise, he must provide evidence to the effect that "to use the recited circuit in an edison type lamp socket ... is a notoriously old design expedient".

(3) Even if it were to be true that "to use the recited circuit in an edison type lamp socket ... is a notoriously old design expedient", Examiner must provide evidence to the effect that this "design expedient" has benefit in the complete context of the invention as actually claimed.

(i) In supporting his rejections of claims 34-37, examiner merely states that:

"the recitations are drawn to a mere rearranging of the essential working parts of the well know gas discharge lamp; such rearrangement has been held to involve only routine skill in the art."

This statement is not pertinent.

If the claimed invention were to have involved nothing more than a rearrangement of a known structure -- which is not the case -- it would still have been non-appropos for Examiner to hold that "such rearrangement has been held to involve only routine skill in the art".

A rearrangement of a known structure is indeed patentable provided such rearrangement results in an unobvious benefit. It would be totally immaterial whether or not such rearrangement could be accomplished with nothing more than "routine skill in the art".

If Examiner were to persist in a contrary position, he is requested to identify a proper authority in support of his contrary position.

CONCLUDING REMARKS

Applicant points out to Examiner that claims 31-38 all represent the structure illustrated by Fig. 1 of Applicant's specification; which structure has been continued uninterruptedly since his application Serial No. 178,107 filed on August 14, 1980.

In support of this priority date, Applicant herewith submits a Revised Oath.

Ole K. Nilssen, Pro Se Applicant